



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF

C-14J

EPA Region 5 Records Ctr.



262730

August 19, 2004

**MEMORANDUM**

**SUBJECT:** Citizen Suit Under CERCLA  
**FROM:** *Deloris Johnson*  
Jacqueline Miller  
Associate Regional Counsel  
**TO:** Richard C. Karl, Acting Director  
Superfund Division

The Office of Regional Counsel has received the attached notice for a citizen suit. Please review the notice to determine whether U.S. EPA is taking or intends to take enforcement action at the referenced facility or site and convey your determination to me via memorandum (C-14J) or telephone (886-7167), or to Deloris Johnson, telephone (886-6806). Enforcement action initiated by U.S. EPA at the facility or site prior to sixty days after receipt of the attached notice may preclude the citizen suit.

cc: Bertram Frey  
Eric Cohen

Eimer Stahl Klevorn & Solberg LLP  
224 South Michigan Avenue, Suite 1100  
Chicago, Illinois 60604  
Tel 312 660 7600 Fax 312 692 1718



Linda P. Kurtos

(312) 660-7629  
[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Arrow Gear Co.  
Stephen E. Gehring, Registered Agent  
1900 Firstier Bank Bldg.  
233 South 13th Street  
Lincoln, NE 68508

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Arrow Gear Co., 2301 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

**Comprehensive Environmental Response, Compensation, and Liability Act**

Please be advised that pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9659), Lindy intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA (42 USC 9607). The contamination remains and continues to migrate onto the Lindy property and downstream locations. Lindy intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Artec Industries, Inc.  
Dorothy Sjogren, Registered Agent  
20338 Brentwood  
Livonia, MI 48152

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Artec Industries, Inc., 5402 Janes St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
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Atlas Tubing Co. a/k/a Da-Kay Enterprises  
William G. Wolfe, Registered Agent  
4525 Gollihar St., Suite 114  
Corpus Christi, TX 78411

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Atlas Tubing Co. a/k/a Da-Kay Enterprises, 2399 Junior Ave., Downers  
Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

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June 15, 2004

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Bales Mold Service  
Gene McCullough, Registered Agent  
323 E. Jackson  
Harlingen, TX 78550

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Bales Mold Service, 2824 Hitchcock Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

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Bison Gear & Engineering Corp.  
Guy E. Snyder, Registered Agent  
222 N. LaSalle St., Suite 2400  
Chicago, IL 60601

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Bison Gear & Engineering Corp., 2615 Curtiss St., Downers Grove, Illinois;  
and 2424 Wisconsin St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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***BY CERTIFIED MAIL  
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Bridges Electric, Inc.  
Michael E. Irwin, Registered Agent  
407 W. Searcy St.  
Heber Springs, AR 72543

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Bridges Electric, Inc., Ellsworth Industrial Park, Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
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Contemporary Control Systems, Inc.  
Thomas J. Sisul, Registered Agent  
5120 Main St., Suite 3  
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Contemporary Control Systems, Inc., 2431 Curtiss St., Downers Grove,  
Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
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CVP Systems, Inc.  
Illinois Corporation Service, Registered Agent  
801 Adlai Stevenson Drive  
Springfield, IL 62703-4261

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
CVP Systems, Inc., 2518 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

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Damon Laboratories  
Registered Agent  
515 Ogden Ave.  
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Damon Laboratories, 515 Ogden Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

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June 15, 2004

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Diamond Power Specialty, Inc.  
CT Corporation Service, Registered Agent  
208 S. LaSalle St., Suite 814  
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Diamond Power Specialty, Inc., Ellsworth Industrial Park, Downers Grove,  
Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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June 15, 2004

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Dicke Tool  
CT Corporation System, Registered Agent  
314 E. Thayer Ave.  
P.O. Box 400  
Bismarck, ND 58502-0400

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Dicke Tool, 1201 Warren Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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June 15, 2004

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Downers Grove Sanitary District  
Registered Agent  
2710 Curtiss St.  
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Downers Grove Sanitary District, 2710 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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June 15, 2004

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Downers Grove Reporter  
Chester J. Winter, Jr., Registered Agent  
922 Warren Ave.  
Downers Grove, IL 60515-3600

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Downers Grove Reporter, 922 Warren Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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June 15, 2004

***BY CERTIFIED MAIL  
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Downers Grove Radiator  
Michael A. Spada, Registered Agent  
1513 Ogden Ave.  
Downers Grove, IL 60515-2737

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Downers Grove Radiator, 1517 Ogden Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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International Piping Services Co.  
CT Corporation System, Registered Agent  
208 S. LaSalle St., Suite 814  
Chicago, IL 60604-1101

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
International Piping Services Co., 2424 Wisconsin Ave., Downers Grove,  
Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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J. L. Clark Manufacturing Co. (Div. of Atlas Tubing)  
William G. Wolfe, Registered Agent  
4525 Gollihar St., Suite 114  
Corpus Christi, TX 78411

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
J. L. Clark Manufacturing Co. (Div. of Atlas Tubing), 2399 Junior Ave.,  
Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

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Please be advised that pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9659), Lindy intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA (42 USC 9607). The contamination remains and continues to migrate onto the Lindy property and downstream locations. Lindy intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

Eimer Stahl Klevorn & Solberg LLP  
224 South Michigan Avenue, Suite 1100  
Chicago, Illinois 60604  
Tel 312 660 7600 Fax 312 692 1718

Linda P. Kurtos

(312) 660-7629  
[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Lovejoy, Inc.  
Chris Lovejoy, Registered Agent  
5455 Hewitt Place Way  
King George, VA 22485-3754

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Lovejoy, Inc., 2655 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Johnson Printers  
Curtis Edwin Johnson, Registered Agent  
750 W. New Haven Ave.  
Melbourne, FL 32901

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Johnson Printers, 2659 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Magnetrol International Inc.  
Judy G. Stevenson, Registered Agent  
5300 Belmont Rd.  
Downers Grove, IL 60515-4400

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Magnetrol International Inc., 5300 Belmont Rd., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Maple Grove Automotive, Ltd.  
William A. Benson, Registered Agent  
2315 Maple Ave.  
Downers Grove, IL 60515-4225

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Maple Grove Automotive, Ltd., 2315 Maple Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Lockformer Company / Met-Coil Systems Corporation  
Randy Stodola, Registered Agent  
711 Ogden Ave.  
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Lockformer Company / Met-Coil Systems Corporation, 711 Ogden Ave.,  
Lisle, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Moldtronics, Inc.  
C. Andrew Miriani, Registered Agent  
40 Shuman Blvd., Suite 150  
Naperville, IL 60563

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Moldtronics, Inc., 703 Rogers St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Molex, Inc.  
Registered Agent  
2222 Wellington Court  
Lisle, IL 60532

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Molex, Inc., 5224 Katrine St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Norwood Marking Systems  
Jack Campbell, Registered Agent  
2538 Wisconsin Ave.  
Downers Grove, IL 60515-4230

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Norwood Marking Systems, 2538 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Packard Instrument Co.  
CT Corporation System, Registered Agent  
1 Commercial Plaza  
Hartford, CT 06103

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Packard Instrument Co., 2200 Warrenville Rd., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Precision Brand Products, Inc.  
Raymond Luchetti, Registered Agent  
3500 Wolf Rd.  
Franklin Park, IL 60131-1321

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Precision Brand Products, Inc., 2250 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Principal Manufacturing Co.  
Norman S. Lynn, Registered Agent  
660 LaSalle Place, Suite 3A  
Highland Park, IL 60035

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Principal Manufacturing Co., 5400 Janes St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

DuPage Manufacturing Co.  
Prentice Hall Corporation, Registered Agent  
33 N. LaSalle St.  
Chicago, IL 60602-2607

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
DuPage Manufacturing Co., 2250 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Rexnord Industries, Inc.  
CT Corporation System, Registered Agent  
225 Hillsborough Street  
Raleigh, NC 27603

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Rexnord Industries, Inc., 2400 Curtiss St., Downers Grove, Illinois; and  
2232 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Scot, Inc.  
Dave Hainfeld, Registered Agent  
1030 N. Curson Ave., #19  
West Hollywood, CA 90046

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Scot, Inc., 2525 Curtiss Rd., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

ServiceMaster, Inc.  
CT Corporation System, Registered Agent  
1200 South Pine Island Road  
Plantation, FL 33324

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
ServiceMaster, Inc., 2300 Warrenville Rd., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Spannagel Tool & Die  
Brian Spannagel, Registered Agent  
336 E. Walnut St.  
Roselle, IL 60172

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Spannagel Tool & Die, 2732 Wisconsin, Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

**Comprehensive Environmental Response, Compensation, and Liability Act**

Please be advised that pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9659), Lindy intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA (42 USC 9607). The contamination remains and continues to migrate onto the Lindy property and downstream locations. Lindy intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

Eimer Stahl Klevorn & Solberg LLP  
224 South Michigan Avenue, Suite 1100  
Chicago, Illinois 60604  
Tel 312 660 7600 Fax 312 692 1718

Linda P. Kurtos

(312) 660-7629  
[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

RHI Holdings, Inc. / Fairchild Corporation  
CT Corporation System, Registered Agent  
1200 South Pine Island Road  
Plantation, FL 33324

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
RHI Holdings, Inc./Fairchild Corporation, 2232 Wisconsin Ave., Downers  
Grove, Illinois; and 2400 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Tricon Manufacturing  
Henry Wu, Registered Agent  
20277 Valley Blvd., Suite H  
Walnut, CA 91789

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Tricon Manufacturing, 5000 Chase St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Brennan Engineering Corp.  
Scott Brennan, Registered Agent  
1421 SW 17th St.  
Boca Raton, FL 33486

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Brennan Engineering Corp., 5235 Katrine Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Vaughan Seed Co.  
CT Corporation System, Registered Agent  
319 S. Coteau  
Pierre, SD 57501-3108

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Vaughan Seed Co., 5300 Katrine St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

White Lake Building Corporation  
D. William Carr, Registered Agent  
1126 Pennsylvania  
Elmira, NY 14904

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
White Lake Building Corporation, 2537 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

William Helwig  
Registered Agent  
250 Pine Street  
Millersburg, PA 17061

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
William Helwig, 5400 S. Janes Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

**Comprehensive Environmental Response, Compensation, and Liability Act**

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Ames Supply Company  
D. William Carr  
Registered Agent  
1126 Pennsylvania  
Elmira, NY 14904

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Ames Supply Company, 2537 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Ace Hardware  
Registered Agent  
701 Brazos St., Suite 1050  
Austin, TX 78701

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Ace Hardware, 1528 Brook Dr., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Grove Printing, Inc.  
Jack W. Grove, Registered Agent  
400 South 6th Street  
Waco, TX 76706

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Grove Printing, Inc., 1247 Warren St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Grayhill Moldtronics, Inc.  
C. Andrew Miriani, Registered Agent  
40 Shuman Blvd., Suite 150  
Naperville, IL 60563

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Grayhill Moldtronics, Inc., 703 Rogers St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Graphics Plus  
Cheryl Luque, Registered Agent  
2608 Rothland  
Plano, TX 75023

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Graphics Plus, 1808 Ogden Ave., Lisle, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Hollister-Stier Laboratories, Inc.  
CT Corporation System, Registered Agent  
520 Pike St.  
Seattle, WA 98101

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Hollister-Stier Laboratories, Inc., 2201 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

General Battery Corporation  
Registered Agent  
1111 W. Long Lake, Suite 300  
Troy, MI 48098

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
General Battery Corporation, 1516 Brook Dr., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Fusibond, Inc.  
Richard H. Krause, Registered Agent  
2615 W. Curtiss  
Downers Grove, IL 60515-4003

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Fusibond, Inc., 2615 W. Curtiss, Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Flexible Steel Lacing Co.  
Leroy W. Meyer, Registered Agent  
2525 Wisconsin Ave.  
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Flexible Steel Lacing Co., 2525 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

The Morey Corporation  
Richard R. Morey, Registered Agent  
100 Morey Dr.  
Woodridge, IL 60517

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
The Morey Corporation, 2659 Wisconsin Ave., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

**Comprehensive Environmental Response, Compensation, and Liability Act**

Please be advised that pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 USC 9659), Lindy intends to sue you as a potentially responsible party and/or for violations of CERCLA and applicable regulations. Specifically, the above entity or individual is or was the owner or operator of a facility in Ellsworth Industrial Park from which hazardous substances have been released to soils and/or groundwater. At some prior time or presently, the above entity or individual or a predecessor caused or allowed the release of hazardous substances into soils and groundwater at the facility, or otherwise falls within the provisions set forth at Section 107 of CERCLA (42 USC 9607). The contamination remains and continues to migrate onto the Lindy property and downstream locations. Lindy intends to sue you for all necessary costs of response consistent with the National Contingency Plan.

Eimer Stahl Klevorn & Solberg LLP  
224 South Michigan Avenue, Suite 1100  
Chicago, Illinois 60604  
Tel 312 660 7600 Fax 312 692 1718

Linda P. Kurtos

(312) 660-7629  
[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Flavorchem  
Salvatore R. Sprovieri, Registered Agent  
1525 Brook Drive  
Downers Grove, IL 60515-1024

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Flavorchem, 1525 Brook Dr., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

Elite Electronic Engineering Co.  
James C. Klouda, Registered Agent  
1516 Centre Circle  
Downers Grove, IL 60515

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
Elite Electronic Engineering Co., 1516 Centre Circle, Downers Grove,  
Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

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Linda P. Kurtos

(312) 660-7629  
[lkurtos@eimerstahl.com](mailto:lkurtos@eimerstahl.com)

June 15, 2004

***BY CERTIFIED MAIL  
RETURN RECEIPT REQUESTED***

DynaGear, Inc.  
CT Corporation System, Registered Agent  
1200 S. Pine Island Rd.  
Plantation, FL 33324

**RE: Soil/Groundwater Contamination Downers Grove, Illinois  
DynaGear, Inc., 2500 Curtiss St., Downers Grove, Illinois  
Notice of Suit CERCLA, RCRA, State Laws**

Dear Registered Agent:

This letter gives notice that Lindy Manufacturing, Inc., of Downers Grove, Illinois (hereafter "Lindy") intends to bring suit against the above entity and/or individual, under provisions of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), the Resource Conservation and Recovery Act (RCRA), and applicable state laws, including violations of state law, and common law causes of action.

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DynaGear, Inc.  
CT Corporation System, Registered Agent  
June 15, 2004  
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Additionally, Lindy may bring an action against you for violation of Section 103(a) of CERCLA (42 USC 9603(a)). You were the person in charge of an onshore facility and have failed to notify the National Response Center of a release of a hazardous substance.

Lindy may bring actions under CERCLA in 60 days and will pursue all applicable remedies and relief available under CERCLA.

### Resource Conservation and Recovery Act

Please be advised that pursuant to Section 7002 of the Resource Conservation and Recovery Act (RCRA) (42 USC 6972), Lindy intends to sue the above entity and/or individual for violations of RCRA and applicable regulations, and for contributing to conditions which may present an imminent and substantial endangerment to health or the environment. Specifically, the above entity and/or individual is or was the owner or operator of the property or otherwise contributed to the contamination. There may be other hazardous wastes, solid wastes or regulated substances which were also released at your property(ies) which present or may present an imminent and substantial threat to public health and the environment. Hazardous wastes and/or solid wastes and/or regulated substances have not been properly handled, stored, or disposed pursuant to the requirements of RCRA and regulations promulgated thereunder. The hazardous wastes and/or solid wastes and/or regulated substances remain and continue to migrate onto the Lindy property and downstream locations.

Lindy may file an action pursuant to 42 USC 6972(a)(1)(A) in 60 days and an action pursuant to 42 USC 6972(a)(1)(B) in 90 days.

### State Claims

This notice also serves as your notice of Lindy's demand for removal and ejectment of the above entity's and/or individual's contaminants from Lindy's property. The toxic and dangerous chemicals from the above entity's and/or individual's facility have migrated across property boundaries and are now located in groundwater at Lindy's facility. Lindy hereby demands that, within 10 days, you remove all solvents and other chemicals and/or compounds which migrated from the above entity's and/or individual's facility. Upon the expiration of this 10-day period, Lindy will pursue state claims, including but not limited to negligence, nuisance, trespass, continuing intentional trespass and violation of the Illinois Environmental Protection Act.

### Conclusion

The above claims may be combined with other federal or state statutory or regulatory actions, and with other common law actions. If we do not reach settlement with you before the notice periods of 60 and 90 days expire, Lindy will bring suit against you in federal court. We

DynaGear, Inc.  
CT Corporation System, Registered Agent  
June 15, 2004  
Page 3

have been retained to represent Lindy in this matter. If you have any questions or would like to discuss this matter further, please contact me.

Very truly yours,

A handwritten signature in black ink, appearing to read "Linda P. Kurtos". The signature is fluid and cursive, with the first name "Linda" and last name "Kurtos" being the most prominent parts.

Linda P. Kurtos

cc: Hon. Michael Leavitt, Administrator, USEPA  
Hon. Bharat Mathur, Acting Regional Administrator, USEPA  
Hon. John Ashcroft, Attorney General, U.S. Department of Justice  
Hon. Renee Cipriano, Director, IEPA  
Hon. Lisa Madigan, Attorney General, State of Illinois  
Hon. Rod Blagojevich Governor, State of Illinois  
(all via certified mail)